

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

IN

RE: NATIONAL PRESCRIPTION,
NO. 2804 OPIATE LITIGATION

MDL

Case No. 17-MD-2804

Judge Dan Aaron Polster

**THIS DOCUMENT RELATES
TO:**

Salmons v. Purdue Pharma L.P., et al.
MDL Case #1:18-OP-45268;

Doyle v. Purdue Pharma L.P., et al.
MDL Case No. #1:18-op-46327

Artz v. Purdue Pharma, L.P., et al.
MDL Case No. #1:19-op-45459

DECLARATION OF KEVIN W. THOMPSON, ESQ.

I, Kevin W. Thompson, declare as follows:

1. My name is Kevin W. Thompson. I am over 18 years of age and have personal knowledge of the facts set forth in this Declaration. I am licensed to practice law in the State of West Virginia. I represent the Plaintiffs in the above-styled action.
2. This declaration is made in support of NAS Guardians' Additional Briefing in Opposition to the Amended Motion for Entry of Order Establishing Common Benefit Fund.
3. Throughout the prosecution of the above-styled litigation, my responsibilities have included several discovery initiatives aimed at developing discovery relevant to the claims of the NAS children that involved accessing the PEC's "Opiates MDL Production Database" hosted by Ricoh using Relativity as an ESI review platform.
4. After several months of requests, the PEC finally gave limited access to the Relativity database that had no capacity for routine database collaboration. Our users are unable to create and save queries, tag or export documents, review searches created by co-counsel,

perform batch exports or even download searchable text files. This has made the useful review of documents much more time-consuming than it should have been.

5. Throughout the hundreds of depositions taken by the PEC, the only issues addressed that relate to “NAS” involved either the rates of NAS or the deponents unfamiliarity with the term. In fact, “NAS” appears in only nine transcripts in each of which only very general questions are asked and very little, if any, follow-up conducted. None of the questions addressed the Defendants’ conspiracy to suppress of the long-term effects of NAS. See Attached Exhibit- Transcript Excerpts.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGONING IS TRUE AND CORRECT.

Executed this 23rd day of June, 2020
in New Orleans, Louisiana.



Kevin W. Thompson